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2 Nevada Bar No. 6266

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8 *Attorney for Defendant*

9
10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA,)

13 Plaintiff,)

CASE NO.: 2:11-MJ-00510-GWF

14 Vs.)

15 JACOB LILL,)

16 Defendant.)

17 **MOTION TO MODIFY PRETRIAL CONDITIONS OF SUPERVISION**

18 COMES NOW, JACOB LILL, defendant herein, by and through his attorney MICHAEL
19 V. CRISTALLI, ESQ., of the Law firm of CRISTALLI & SAGGESE, LTD., and respectfully
20 moves this Honorable Court for a Motion to Modify Pretrial Conditions of Supervision.

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1 This Motion is based on the attached Points and Authorities and any evidence and/or
2 argument that may be adduced at a hearing in this matter.

3 DATED this _____ day of August, 2011.

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POINTS AND AUTHORITIES

Defendant was placed on Pretrial Supervision with the stipulation that he is not to leave the jurisdiction. Defendant's grandmother, whom raised Defendant, presently resides in Colorado. She recently underwent emergency surgery in Colorado and is now in the Intensive Care Unit. This emergency surgery was unsuccessful and Defendant's grandmother is not expected to survive her current condition. Our office has spoken with Officer Terry Wheaton who is currently the Defendant's Pretrial Supervisor. Officer Wheaton does not have an objection to Defendant traveling to see his grandmother in Colorado as long as the GPS ankle monitor remains in place.

CONCLUSION

The Defendant respectfully prays that this motion be granted so he may visit his grandmother before she perishes.

DATED this ____ day of August, 2011.


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Attorney for Defendant

IT IS SO ORDERED this 15th day of August, 2011.


Peggy A. Leen

United States Magistrate Judge